

# CITY OF LEEDS, ALABAMA

## 2020-21 ANNUAL REPORT

PREPARED BY  
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CITY ENGINEER

Certification

City of Leeds, Alabama

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the persons or persons who manage the system or those persons directly responsible for the gathering of the information, to the best of my knowledge and belief the information submitted is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines imprisonment for knowing violation.



David Miller, Mayor



Date



## 1.0 Introduction

### *1.1 City of Leeds Phase II MS4 Program*

The City of Leeds was issued its current NPDES Permit for discharges from regulated small municipal separate storm sewer systems (No. ALR04000) by the Alabama Department of Environmental Management (ADEM) on September 6, 2016. The permit was made effective on October 1, 2016.

### *1.2 Leeds MS4*

The City of Leeds Municipal Separate Storm Sewer System (Leeds MS4) is defined as the area within the city limits. The Leeds MS4 comprises approximately 22.1 square miles (4.09%) of the Birmingham, Alabama Urbanized Area. According to the 2010 Census, the City of Leeds has a total population of 11,773, approximately 75.0% of which live within the designated urbanized area boundary.

### *1.3 Watershed Information*

Leeds receives approximately 55 inches of rainfall annually. Rainfall tends to be evenly distributed throughout the year with drier periods occurring during late summer and early fall. Stormwater runoff from Leeds discharges into two primary receiving streams. The majority of the city drains centrally to the Little Cahaba River. The Little Cahaba flows to Lake Purdy which eventually drains into the Cahaba River southwest of Leeds. A small portion of the northwest side of the city flows to the Cahaba River. The Little Cahaba River is currently impaired for Total Dissolved Solids. Impairment to the Little Cahaba is derived exclusively from non-point source (NPS) and Municipal Separate Storm Sewer Systems (MS4) pollutant loadings, for which needed reductions are being sought under Total Maximum Daily Load (TMDL) implementation. The City of Leeds limits encompasses more than than 50% of the total watershed of the Little Cahaba River. Due to the impact on the Little Cahaba, Leeds conducts monitoring of this impaired water.

### *1.4 Annual Report*

Part VI of the NPDES MS4 permit requires ASU to submit an annual report to ADEM each year. The annual report is to summarize activities between March 31 of the reporting year and April 1 of the previous year. This report covers the period from October 18, 2017 (date of permit issuance) to March 31, 2018 and includes the following required information:

- *2.0, A list of contacts and responsible parties*
- *3.0, An overall evaluation of Leeds Stormwater Management Program*
- *4.0, A narrative report of the required minimum control measures*
- *5.0, A summary of future controls*
- *6.0, A notice of reliance on others*



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### *1.5 Availability of Report*

This annual report has been provided to the Alabama Department of Environmental Management in paper and electronic format. The report will be accessible for public review on or through the City of Leeds web site in the future, along with the NPDES permit and an updated Stormwater Management Program Plan, or SWMPP. Printed copies of the report are available upon request.

### **2.0 Contacts Responsible Parties**

The personnel responsible for preparation of this report are:

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### **3.0 Overall Stormwater Management Program Evaluation**

#### *3.1 Major Accomplishments*

The City's Development Office is the coordinator of the program among various city departments and outside agencies. The City is always looking for opportunities to improve the program. During 2020-21, the City has entered into agreements with other permit holders to advance the city's delivery of various Minimum Control Measures (MCM's) such as education, public participation. The city is expanding its co-sponsoring of events with other permittees to bring greater participation and quality to the MCM events. The program brought online its new permitting and enforcement tracking system; the system is public facing. It allows citizens to initiate and track both the permitting and complaint process at any time.

You may visit the system at <https://www2.citizenserve.com/leedsal>

The City has modified its SWMP as part of this annual review that better defines and clarifies the city's action regarding its MS4 program.



The City of Leeds Council in 2020 altered its stormwater fee structure as such to bring much-needed funding to the program. The courage of the council to take on a tax increase demonstrates their commitment to improving and delivering a program that is on par with other communities in our area.

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### *3.2 Overall Program Strengths and Weaknesses*

The City is proactive in communicating the public and its staff of the goals listed in the SWMPP. The City's Awareness of environmental responsibilities and expectations is increasing among city staff as the stormwater program leaders share information about the importance of operating following regulatory permitting. Since the permit issuance, new staff members have come aboard in various departments who are responsible for program elements and take their responsibilities regarding program compliance seriously.

Area of weakness includes standard operating procedures related to pollution prevention and good housekeeping associated with city facilities, attracting public involvement during meetings and events scheduled for that purpose and acceptance of regulatory requirements by the citizens of the city.

Areas of strength include the permitting and enforcement capabilities; the city is very successful at gaining compliance for violations of permits and littering. The city's litter, street sweeping, and bulk waste programs are very robust programs and produce excellent returns for the city, removing tons of material that would have become floating debris save the collection of that material by the city. The City's construction stormwater program is very successful; the frequent inspections and patrols by staff allow the city to achieve compliance on these sites. Additionally, the cooperation between development staff and the public works crews expands the reach and frequency of inspections and the discovery of areas of potential concern.

### *3.3 Future of the program*

The future of the program we expect to improve, as much needed funding arrives to expand program activities, we only expect improvements in outcomes to the MCM strategies.

As part of this report, a revised SWMP is submitted to ADEM, the revisions to the SWMP will be implemented in 2020, and the assessment included in next year's annual report.

## **4.0 Narrative Report**

Part III. A of the city's NPDES permit requires the development, implementation, revision, and maintenance of a stormwater management program to reduce the discharge of pollutants into local waterways and streams. A revised SWMPP is submitted in conjunction with this report to ADEM, the



minimum control measures required by the permit are established. This SWMPP is the governing authority in ensuring that the six minimum control measures are enacted: public education, public involvement; illicit discharge detection and elimination; construction site stormwater runoff control; post-construction stormwater management; and pollution prevention/good housekeeping for municipal operations. A narrative report for the implementation of each control measure is found in the sections below.

#### **4.1 Public Education and Public Involvement (MCM 1 & 2) (For this permit, MCM 1 & 2 are combined)**

##### *Permit Requirements*

Public Education and Involvement (MCM-1) requires the City to implement and evaluate a public education and involvement program, centered on the SWMP and the annual report, that distributes educational materials to the community, or that conducts equivalent outreach activities about the impacts of polluted discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff to the maximum extent practical.

##### *Target Audience*

The general public, local schools, elected officials, developers, contractors, and professional groups will be targeted for MCM-1.

##### *Current Programs (BMP's)*

Due to Health Concerns with the pandemic, many of the programs offered in 2020, were required to be placed on hold. The City intends to re-implement its programs in the 2021 cycle as allowed by health directives. Former videos are available at <https://www.leedsalabama.org/5-things-you-need-to-know-about-litter/> .

##### *Website*

*The Internet provides a highly accessible medium for relaying information and data to all citizens. The City of Leeds's website features links to the City's SWMP, MS4 information, Annual Report, and other storm water related topics. The website is continually updated as information warrants.*

##### *Brochures and Pamphlets*

The City utilizes several brochures produced by EPA and other NPDES programs to help educate the citizenry of Leeds. The brochures include but are not limited to:

- Green scaping
- Green up your Lawn, not Lakes
- Household Hazardous Waste
- Water Efficient Landscape
- Stormwater Placements – Kids



Make your home the solution to water pollution  
Stormwater Pollution found in your area – Flyer  
Clean Water  
After the Storm

The brochures are made available in paper form at City Hall, electronically attached to each permit and business license issued by the City and posted to the website.

Due to the pandemic, attending workshops and continuing education was somewhat limited, however the City did participate in on-line remote workshops which were sponsored by the Alabama Stormwater Association. Links to the various workshops can be found at <https://alabamastormwater.org/videos/>

### *Certifications*

The City encourages the attendance of construction professionals at training and workshops by requiring QCI training for builders and developers working in the city. This effort exposes contractors to yearly training in the area of construction pollution prevention. Organizations like the Association of Home Builders offer continuing education for contractors and sub-contractors. While not a requirement for builders in Leeds, all contractors are encouraged to utilize these sources for education for the Cities Programs.

### *Workshops - Public*

While the City has previously attempted to conduct workshops for homeowners and the public, those events were poorly attended, and the city has directed its limited resources in other paths to deliver the educational materials. COVID concerns and social distancing during the 2020 period, the City plans to hold public workshops and education as the opportunities allow in 2021.

### *Pet Disposal Stations*

The City provides pet waste disposal stations at its Memoria Park located on Montevallo Rd. In 2020 there was no NEMO education provided – the City offers this education once every four years (once per election cycle).

### *Recycling*

The City's recycling program continued in 2020. The City's recycling program is a single point collection center with citizens bringing their recyclables for processing. This program is a successful program that receives support from a broad spectrum of the community.



### *Report a Concern Program*

The City's new online "Report a Concern." system has been a help in the fact that the system allows a citizen report on a complaint and – most importantly – track the progression of the complaint as it works through the abatement process. You may visit the portal at <https://www2.citizenserve.com/leedsal>

### *Storm Water Board*

The Storm Water Board was created as a forum to solicit public input; however, this measure has proven to be unsuccessful at attracting involvement from Leeds residents. While the city appreciates and considers feedback from regional groups, the Board's ability to acquire input from our constituency has been weak. The Board is looking at ways to increase its relevancy in 2021-22.

### *Festivals and Events*

Due to Social Distance and Health concerns, the City was not able to host its normal City Events. As Health concerns are relaxed, the City will resume the normal scheduled events in 2021, as possible.

### *Keep Leeds Green and Clean*

The City has shifted its Keep Leeds Green and Clean Program from a once per year event to an ongoing process. City enforcement officers will visit a site and post a door hanger on the door, alerting the resident that they may have litter or an inoperable motor vehicle on their property that needs to be removed. Failure to comply will result in the matter going before the City Council, after a ten (10) day notification period. If the City Council determines the case to be a public nuisance, city crews are dispatched to abate the violation, thus achieving compliance.

### *Measurable Goals*

The City is exploring ways to move public education and involvement via remote and

### *Program Future*

The program will continue to produce those BMP's that have proven themselves successful during the program year and work to improve those, the Storm Water Board, which have not meet expectations or may need refinement. As this report is being written during the COVID 19 pandemic we are working to find way to achieve Public Education and Participation in in the new world of social distancing.



#### *4.2 Illicit Discharge Detection and Elimination (MCM 3)*

##### *Permit Requirements*

The Illicit Discharge Detection and Elimination (MCM-3) requires the City to, enforce, and evaluate a program to detect and eliminate illicit discharges and improper disposal into the City's regulated MS4 area, including spills not under the scope of another responding authority.

##### *Target Audience*

The general public, local schools, elected officials, developers, contractors, and professional groups are targeted for MCM-3.

##### *IDDE Legal Authority*

The City's Stormwater Ordinance provides the legal authority to enforce IDDE inspections and enforcement action. You may view the ordinance at Ord. No. 2020-12-01, § 6, 1-27-2020

##### *Standard Operating Procedures - IDDE*

When investigating and acting on IDDE issues and complaints the City follows its standard operating procedures to process the matters related to IDDE's.

<https://library.municode.com/al/leeds/munidocs/munidocs?nodeId=2697d7e7db503> Inspection and case progression are maintained in the Citizenserve system. The program is designed to educate, warn and enforce. Field staff from the Police, Fire, Development and Public Works Departments all work together to observe and report issues which may cause water pollution.

##### *Enforcement Actions*

During 2020 the city investigated illicit discharge incidents in the City.

*The record of enforcement actions may be viewed upon written request to the City Administrator or may be found in the city's on-line complaint system*

##### *Staff Training*

Each employee of the department is required to be QCI certified, and as part of the QCI certification, annual training is required to maintain certification. In addition to the QCI certification, the city participates in workshops – those produced by the Alabama Storm Water



Association and ADEM to further the education of our employees. While several certifications were postponed due to COVID concerns however all certifications shall be completed as soon as classes are available.

### *Testing*

The City has twenty-eight (28) known outfalls connecting to the Little Cahaba River – an impaired waterway. The city screens these outfalls on an annual basis to detect illicit discharges and to determine compliance with the TDML for total dissolved solids - Industrial – Upper Cahaba Watershed - HUC 03150202- Assessment AL03150202-0103-102. The sampling data for 2020 may be made available upon written request to the City Administrator.

### *Future Programs*

The City will continue the programs currently in place as they have proven successful and will continue to seek out ways of improving its IDDE program.

#### *4.3 - Construction Site Storm Water Runoff Control (MCM-4)*

### *Permit Requirements*

The Construction Site Storm Water Runoff Control (MCM-3) requires the development, implementation, and enforcement of a program to reduce pollutants in any storm water runoff to the MS4 from construction activities that result in a total land disturbance of greater than or equal to one acre, as well as activities that disturb less than one acre but are part of a larger common plan of development or sale that would disturb one acre or more.

### *Target Audience*

Developers, contractors, homebuilders, professional consultants, and city staff are targeted for this MCM. The City shall make available information for Developers and designers to encourage green development. Information shall be both published links to established sources, and printed material.

### *Authority – Erosion and Sedimentation Control Ordinance*

The City of Leeds adopted its storm water ordinance can be found at Ord. No. 2016-05-03, adopted May 16, 2016 and may be found:

<https://leeds.municipalcodeonline.com> – under Chapter 20: Environment.



The city regulates all sites less than one (1) acre. Site one (1) acre and above the city relies upon ADEM for regulation.

#### *Erosion and Sediment Control Training*

All City Building Inspectors are required to receive annual training through ADEM's Qualified Credential Inspector program. This training gives the inspectors the knowledge needed to effectively monitor single- family residential and commercial construction sites for erosion and sediment controls and for storm water runoff concerns.

#### *Permitting and SOP's*

The City utilizes an online permitting system which allow the stakeholder and the public access to permits and the supporting documentation at any time. The Citizenserve system is the city's repository system for all permits and related documentation for permitted sites. The system may be viewed at:

<https://www2.citizenserve.com/leedsal>